

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
Charles K. Verhoeven (Bar No. 170151)
2 charlesverhoeven@quinnemanuel.com
David Eiseman (Bar No. 114758)
3 davideiseman@quinnemanuel.com
Sam Stake (Bar No. 257916)
4 samstake@quinnemanuel.com
50 California Street, 22nd Floor
5 San Francisco, California 94111-4788
Telephone: (415) 875-6600
6 Facsimile: (415) 875-6700
7 Lance Yang (Bar No. 260705)
lanceyang@quinnemanuel.com
8 865 S. Figueroa St., 10th Floor
Los Angeles, California 90017
9 Telephone: (213) 443 3000
Facsimile: (213) 443 3100

10 *Attorneys for Plaintiff Keyssa, Inc.*

KEKER, VAN NEST & PETERS LLP
Robert A. Van Nest (Bar No. 84065)
rvannest@keker.com
Leo L. Lam (Bar No. 181861)
llam@keker.com
Daniel Purcell (Bar No. 191424)
dpurcell@keker.com
Matthew M. Werdegarr (Bar No. 200470)
mwerdegarr@keker.com
Ryan K. Wong (Bar No. 267189)
rwong@keker.com
Christina Lee (Bar No. 314339)
cleee@keker.com
633 Battery Street
San Francisco, CA 94111-1809
Telephone: (415) 391-5400
Facsimile: (415) 397-7188

*Attorneys for Defendant
Essential Products, Inc.*

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **OAKLAND DIVISION**

14 KEYSSA, INC.,

15 Plaintiff,

16 vs.

17 ESSENTIAL PRODUCTS, INC.,

18 Defendant.

CASE NO. 4:17-cv-05908-HSG

**JOINT STIPULATION AND ORDER
REGARDING KEYSSA, INC.'S SERVICE
OF TRADE SECRET DISCLOSURES
AFTER ENTRY OF A PROTECTIVE
ORDER**

Jury Trial Demanded

19
20 Pursuant to Civil Local Rules 6-2, Plaintiff Keyssa, Inc. ("Keyssa") and Defendant Essential
21 Products, Inc. ("Essential") (collectively, the "Parties"), by and through their respective counsel of
22 record, hereby stipulate as follows:

23 **WHEREAS**, pursuant to the Court's February 5, 2019 Amended Scheduling Order (Dkt. No.
24 46), Keyssa is required to serve its Trade Secret Disclosures no later than March 8, 2019;

25 **WHEREAS** the parties have yet to reach final agreement on the scope of a proposed
26 Protective Order in this matter, and therefore no Protective Order has yet been entered by this Court;

27 **WHEREAS** the parties expect to file a stipulated, proposed Protective Order on March 6,
28 2019;

1 **WHEREAS** good cause exists for Keyssa to refrain from serving its Trade Secret Disclosures
2 until after the entry of a Protective Order because, by necessity, Keyssa's Trade Secret Disclosures
3 will contain Keyssa's confidential, trade secret information, Keyssa would be harmed by unrestricted
4 disclosure of its confidential trade secret information, and such an Order shall govern the process for
5 serving and handling confidential information in this case;

6 **WHEREAS** this Stipulation is accompanied by the concurrently-filed Declaration of Sam
7 Stake in Support of the Joint Stipulation and [Proposed] Order Regarding Keyssa, Inc.'s Service of
8 Trade Secret Disclosures After Entry of a Protective Order;

9 **NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE THAT** the
10 March 8, 2019 deadline for Keyssa to serve its Trade Secret Disclosures pursuant to California Code
11 Civ. Proc. § 2019.210 be vacated. Keyssa shall not serve its Trade Secret Disclosures upon Essential
12 until such time that the Court enters a Protective Order governing the service and handling of
13 confidential information in this matter. Keyssa shall serve its Trade Secret Disclosures upon Essential
14 immediately upon entry of such a Protective Order, and in no event later than within one (1) day
15 following the entry of such an order.

16 **IT IS SO STIPULATED.**

17
18 **** Signatures on following page. ****
19
20
21
22
23
24
25
26
27
28

1 Dated: March 6, 2019

Respectfully submitted,

2 QUINN EMANUEL URQUHART & SULLIVAN, LLP

3

4 By: /s/ Daid Eiseman

David Eiseman
Charlie K. Verhoeven
Sam Stake

6

QUINN EMANUEL URQUHART & SULLIVAN, LLP
50 California Street, 22nd Floor
San Francisco, California 94111
(415) 875-6600
(415) 875-6700 (facsimile)

9

Lance Yang
865 S. Figueroa St., 10th Floor
Los Angeles, California 90017
(213) 443 3000
(213) 443 3100 (facsimile)

12

Attorneys for Plaintiff Keyssa, Inc.

13

14 Dated: March 6, 2019

Respectfully submitted,

15 KEKER, VAN NEST & PETERS LLP

16

17 By: /s/ Ryan K. Wong

Robert A. Van Nest
Leo L. Lam
Daniel Purcell
Matthew M. Werdegarr
Ryan K. Wong
Christina Lee

18

19

20

21

KEKER, VAN NEST & PETERS LLP
633 Battery Street
San Francisco, CA 94111-1809
Telephone: (415) 391-5400
Facsimile: (415) 397-7188

24

Attorneys for Defendant Essential Products, Inc.

25

26

27

28

1
2 **ATTESTATION**

3 Pursuant to Civil Local Rule 5-1(i)(3), I attest that all other signatories listed, and on whose
4 behalf this filing is submitted, concur in the filing's content and have authorized the filing.

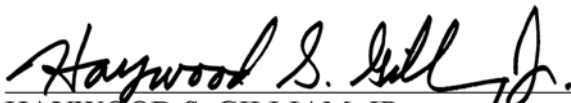
5 Dated: March 6, 2019

/s/ David Eiseman

6 David Eiseman
7
8
9

10 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED** the March 8, 2019 deadline
11 for Keyssa to serve its Trade Secrets Disclosures pursuant to California Code Civ. Proc. § 2019.210 is
12 hereby vacated. Keyssa shall not serve its Trade Secret Disclosures upon Essential until such time
13 that the Court enters a Protective Order governing the service and handling of confidential information
14 in this matter. Keyssa shall serve its Trade Secret Disclosures upon Essential immediately upon entry
15 of such a Protective Order, and in no event later than within one (1) day following the entry of such an
16 order.
17

18 Dated: March 7, 2019


HAYWOOD S. GILLIAM, JR.

20 United States District Judge
21
22
23
24
25
26
27
28